

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: Ruth Tines

Debtor

)
) **Case No: 15 B 32642**
) **Judge: Hunt**
) **Chapter 13**
)

NOTICE OF MOTION

Served upon the following parties electronically:

Office of United States Trustee, Dirksen Federal Building, 219 S. Dearborn, St., Room 873, Chicago, IL 60604

Trustee: Marilyn O. Marshall, 224 S. Michigan Ste. 800, Chicago, IL 60604

and served upon the following parties via U.S. Mail:

Debtor: Ruth Tines, 3548 W 76th Pl, Chicago, IL 60652

See Attached Service List

PLEASE TAKE NOTICE that on June 24, 2019 at 10:00 a.m.,
or as soon thereafter as I may be heard, I shall appear before the Honorable Judge
Hunt, or any other Bankruptcy Judge presiding in her place in Courtroom 719 of the
Dirksen Federal Building, 219 S. Dearborn St., Chicago, Illinois, on the attached Motion
to Modify Plan, and shall request that the attached Order be entered, at which time you
may appear if so desired.

PROOF OF SERVICE

I, The undersigned, an attorney, hereby certify that a copy of this notice was
served electronically or mailed to the above persons, at her respective addresses, postage
prepaid, by depositing in the U.S. Mail at 211 W. Wacker Dr., Chicago, IL 60606, before
6:00 p.m. on or before June 3, 2019.

/s/ Angelica Harb
Angelica Harb
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 300
Chicago, IL 60606
312-273-5001

Label Matrix for local noticing
0752-1
Case 15-32642
Northern District of Illinois
Eastern Division
Mon Jun 3 17:43:50 CDT 2019

DIRECTV, LLC by American InfoSource LP as ag
PO Box 5008
Carol Stream, IL 60197-5008

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

Advocate Christ Medical Center
4440 W 95th St
Oak Lawn, IL 60453-2600

American InfoSource LP as agent for
T Mobile/T-Mobile USA Inc
PO Box 248848
Oklahoma City, OK 73124-8848

American InfoSource LP as agent for
Verizon
PO Box 248838
Oklahoma City, OK 73124-8838

Armor Systems Co
1700 Kiefer Dr
Ste 1
Zion, IL 60099-5105

Arrow Financial Services
5996 W Touhy Ave
Niles, IL 60714-4610

Cardiovascular Consultants
2800 West 95th St
Evergreen Park, IL 60805-2701

Cbe Group
1309 Technology Pkwy
Cedar Falls, IA 50613-6976

Cci
Contract Callers I
Augusta, GA 30901

Certifed Svc
1733 Washington St Ste 2
Waukegan, IL 60085-5192

City of Chicago Department Revenue
c/o Arnold Scott Harris P.C.
111 W Jackson Blvd Ste 600
Chicago, IL 60604-3517

City of Chicago Parking
Dept of Revenue
PO Box 88292
Chicago, IL 60680-1292

Columbus Cabrini
c/o Hoevel Talbot Assoc.
225 W Washington St.
Chicago, IL 60606-2418

ComEd
PO Box 6111
Carol Stream, IL 60197-6111

Comcast Cable
PO Box 3002
Southeastern, PA 19398-3002

Commonwealth Edison Company
3 Lincoln Center
Attn: Bankruptcy Department
Oakbrook Terrace, IL 60181-4204

Credit Acceptance
Attn: Bankruptcy Dept
25505 West 12 Mile Rd Ste 3000
Southfield, MI 48034-8331

DIRECTV, LLC American InfoSource LP as agent
PO Box 5008
Carol Stream, IL 60197-5008

Enhanced Recovery Corp
Attention: Client Services
8014 Bayberry Rd
Jacksonville, FL 32256-7412

Falls Collection Svc
Po Box 668
Germantown, WI 53022-0668

First Premier Bank
601 S Minnesota Ave
Sioux Falls, SD 57104-4868

IC System
Attn: Bankruptcy
444 Highway 96 East; Po Box 64378
St. Paul, MN 55164-0378

IRS
Special Procedures - Insolvency
PO Box 7346
Philadelphia, PA 19101-7346

(p)ILLINOIS DEPARTMENT OF REVENUE
BANKRUPTCY UNIT
PO BOX 19035
SPRINGFIELD IL 62794-9035

Illinois Department of Revenue
PO Box 4385
Chicago, IL 60680-4385

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Lance Martin & Assoc.
5996 W Touhy Ave.
Niles, IL 60714-4610

M.C.O.A.
City of Hometown
Municipal Collections of America, Inc.
3348 Ridge Rd
Lansing, IL 60438-3112

Mage & Price
707 Lake Cook Road
Deerfield, IL 60015-5613

Midland Credit Management, Inc. as agent for
MIDLAND FUNDING LLC
PO Box 2011
Warren, MI 48090-2011

Midnight Velvet
Swiss Colony Midnight Velvet
1112 7th Ave
Monroe, WI 53566-1364

Midnight Velvet
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380-0849

Monroe & Main
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380-0849

Monroe And Main
1112 Seventh Ave.
Monroe, WI 53566-1364

Municollofam
3348 Ridge Road
Lansing, IL 60438-3112

Oaklawn Immediate Care
4419 W 95th St
Oak Lawn, IL 60453-7223

PEOPLES GAS LIGHT & COKE COMPANY
200 EAST RANDOLPH STREET
CHICAGO, ILLINOIS 60601-6433

Peoples Gas
Attention: Bankruptcy Department
130 E. Randolph 17th Floor
Chicago, IL 60601-6207

Scotts Lawn Service
PO Box 388
Marysville, OH 43040-0388

Sears/cbna
Po Box 6282
Sioux Falls, SD 57117-6282

Speedy Cash
3611 N Ridge Rd
Wichita, KS 67205-1214

Target Credit Card (TC)
C/O Financial & Retail Services
Mailstop BT P.O. Box 9475
Minneapolis, MN 55440-9475

University of Chicago Medical Ctr
15965 Collections Center Drive
Chicago, IL 60693-0159

Verizon
500 Technology Dr
Ste 550
Weldon Spring, MO 63304-2225

Jason Blust
Law Office of Jason Blust, LLC
211 W. Wacker Drive
Ste. 300
Chicago, IL 60606-1390

Marilyn O Marshall
224 South Michigan Ste 800
Chicago, IL 60604-2503

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Ruth L Tines
3548 W. 76th Place
Chicago, IL 60652-1410

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Illinois Department of Revenue
100 W. Randolph Street
Legal Services M/C
Chicago, IL 60601

(d)Illinois Department of Revenue
Bankruptcy Section Suite 7-400
PO BOX 64338
Chicago, IL. 60664-0338

Jefferson Capital Systems
16 Mcleland Rd
Saint Cloud, MN 56303

(d)Jefferson Capital Systems LLC
Purchased From Verizon Wireless
Po Box 7999
Saint Cloud Mn 56302-9617

End of Label Matrix
Mailable recipients 49
Bypassed recipients 0
Total 49

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: Ruth Tines

Debtor

)
) **Case No: 15 B 32642**
) **Judge: Hunt**
) **Chapter 13**
)

MOTION TO MODIFY PLAN

Now comes Ruth Tines (hereinafter referred to as “Debtor”), by and through her attorneys, and moves this Honorable Court for entry of an Order Modifying Plan, pursuant to section 1329 of the bankruptcy code, and in support thereof, respectfully represents as follows:

1. On September 25, 2015, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor’s Chapter 13 plan on December 16, 2015. The confirmed plan called for payments of \$345.00 for 60 months, paying unsecured creditors 6% on their claims.
3. Debtor’s confirmed plan calls for the commitment period to be 60 months. At the time of filing, the Debtor’s priority creditors amounted to \$14,587.00 which caused her case to run 60 months. The priority creditors that actually filed claims in the Debtor’s case amounted to \$11,886.37. Debtor is under median and is eligible for a minimum commitment period of 36 months. At a 36 month plan, Debtor will pay general unsecured creditors 10% of their claims.
4. Debtor’s case is currently running over term because of the minimum 60 month term which causes the minimum pot balance to be \$23,084.00. Debtor’s minimum pot balance should be \$12,420.00 since she is under median and eligible for a minimum

commitment period of 36 months. Debtor believes she can finish her case timely if her plan payment is increased to \$460.00 per month. Debtor believes she can afford to pay the new plan payment and her other household expenses. Please see attached Exhibit A for Debtor's I and J schedules.

5. The Debtor is respectfully requesting that her minimum commitment period is decreased to 36 months.

6. If the Debtor's commitment period is decreased, and her plan payment is increased to \$460.00 per month, the general unsecured creditors will receive at least 10% of their claims.

WHEREFORE, Debtor prays that this Honorable Court enter an Order for the following relief:

1. Decreasing the Chapter 13 plan commitment period to 36 months;
2. Increasing the Chapter 13 plan payment to \$460.00 per month; and
3. For such other relief as this Court deems proper under the circumstances.

Respectfully submitted,

 /s/ Angelica Harb
Angelica M. Harb
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 300
Chicago, IL 60606
312-273-5001